



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

OCT 23 2001

400 Seventh St., S.W.  
Washington, D.C. 20590

Ref. No. 01-0244

Mr. Ken Onishi  
President  
Iochem Corporation  
6520 N. Western, Suite 200  
Oklahoma City, Ok 73116

Dear Mr. Onishi:

This responds to your September 13, 2001 letter requesting clarification on the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) and the International Maritime Dangerous Goods (IMDG) Code to the transportation of crude iodine. Specifically, you ask whether your crude iodine is properly classed and about the proper packaging for that material.

Under the provisions of § 173.22, it is the shipper's responsibility to properly class and describe a hazardous material. This Office does not normally perform that function. According to your letter and attached Material Safety Data Sheet, crude iodine does not meet the LD50 defining criteria as a Toxic and Infectious Substance (Class 6) under Chapter 2.6.2.2.4.1 of the IMDG Code. If your material does not meet the hazard class criteria for Class 6 materials or any other hazard class defining criteria in the IMDG Code or Part 173 of the HMR, and is not a hazardous waste, hazardous substance, or marine pollutant, it is not subject to the HMR.

However, you have determined that crude iodine does meet the defining criteria for Class 9 materials because of its odor and is shipped as "Environmentally hazardous substance, solid, n.o.s. (iodine), 9, UN 3077, PG III". Specification packagings such as fiber drums and flexible intermediate bulk containers are required under the HMR and IMDG Code.

I hope this answers your inquiry.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



010244



September 13, 2001

Department of Transportation  
Research and Special Programs Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Re: Hazardous Materials Regulations

Dear Sirs:

This letter (copy enclosed) was sent to you on August 13, 2001. We requested a reply at that time and have not had a response from you. As this information is vital to the timely performance of our business, we respectfully request an answer at your earliest possible convenience.

Best regards,

A handwritten signature in dark ink, appearing to read "Ken Onishi". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ken Onishi, President  
Iochem Corporation

KO: cj

Enclosures